

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
NEWARK VICINAGE**

OCCIDENTAL CHEMICAL CORPORATION,)	Civil Action No.
)	2:18-cv-11273
Plaintiff,)	
)	Hon. Madeline Cox
v.)	Arleo, U.S.D.J.
)	Hon. Leda D.
21 ST CENTURY FOX AMERICA, INC., <i>et al.</i> ,)	Wettre, U.S.M.J.
)	
Defendants.)	ORAL
		ARGUMENT
		REQUESTED

**NOTICE OF MOTION FOR SUMMARY JUDGMENT PURSUANT
TO FED. R. CIV. PROC. 56**

TO: John McDermott, Esq. William J. Stack, Esq. Charles J. Dennen, Esq. ARCHER & GRENIER, P.C. One Centennial Square Haddonfield, NJ 08033 Kathy D. Patrick, Esq. Anthony N. Kaim, Esq. Jorge M. Guterrez, Esq. GIBBS & BRUNS, LLP 110 Louisiana, Suite 5300 Houston, TX 77002	Larry D. Silver, Esq. David M. Romine, Esq. Jennifer Graham Meyer, Esq. Erin M. Carter, Esq. LANGSAM STEVENS SILVER & HOLLAENDER, LLP 1818 Market Street, Suite 2610 Philadelphia, PA 19103 ALL OTHER COUNSEL OF RECORD
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*Attorneys for Plaintiff
Occidental Chemical
Corporation*

PLEASE TAKE NOTICE that on September 19, 2022, at 10:00 a.m. at the United States District Court for the Hon. Madeline Cox Arleo, U.S.D.J., District of New Jersey, at 50 Walnut St., Newark, NJ 07102, or as soon thereafter as counsel may be heard, Defendant Chargeurs, Inc. ("Chargeurs") will move before the Court for summary judgment pursuant to Fed. R. Civ. Proc. 56 dismissing the amended complaint against it with prejudice on the basis that Chargeurs is not a legal person under CERCLA.

PLEASE TAKE FURTHER NOTICE that Chargeurs shall rely on Chargeurs' Brief in Support of Motion for Summary Judgment, Declaration of Steven M. Richman, Chargeurs' Statement of Material Facts, and the record in this action.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is included, and **oral argument is requested**.

Respectfully submitted,

Dated: August 25, 2022

CLARK HILL PLC

By: /s/ Steven M. Richman

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Attorneys for Defendant,
Chargeurs, Inc.

*Admitted *Pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that on August 25, 2022, I caused the foregoing **NOTICE OF MOTION** along with the following documents:

1. **CHARGEURS' BRIEF IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT;**
2. **DECLARATION OF STEVEN M. RICHMAN;**
3. **STATEMENT OF MATERIAL FACTS; and**
4. **PROPOSED ORDER.**

served upon all counsel of record by filing same through the CM/ECF Electronic filing system of the United States District Court for the District of New Jersey.

/s/ Steven M. Richman